

## STATE OF WASHINGTON

OFFICE OF  
INSURANCE COMMISSIONER

In the Matter of	)	
	)	ORDER NO. D05-436
THE UNION LABOR LIFE	)	
INSURANCE COMPANY	)	CONSENT AND ORDER
	)	LEVYING A FINE
Authorized Insurer		

**FINDINGS OF FACT**

1. The Union Labor Life Insurance Co. ("Union Labor") is authorized to conduct insurance business in the State of Washington.
2. On January 5, 2005, Union Labor informed the Washington State Office of the Insurance Commissioner ("OIC") that it had issued unfiled group life certificates and riders to 143 Washington residents.
3. On January 12, 2005, the OIC requested the date the forms were filed and their form numbers. The company did not respond and, on April 5, 2005, a follow-up letter was sent. The company advised on April 27, 2005, that due to year-end procedures and a shortage of actuarial staff, its filings had been delayed. The forms were expected to be filed by May 13, 2005. The OIC encouraged the company to keep this deadline as this would be considered in determining enforcement action. The company advised on May 12, 2005, that it had sent the filings to the OIC. The filings were received on May 16, 2005.
4. The forms were not compliant with two of Chapter WAC 284's regulations. At OIC's request, the forms were revised to conform to the Insurance Code, and were approved on June 22 and 28, 2005.
5. The company delivered revised forms to each of the impacted Washington policyholders on October 20, 2005.
6. No policyholders had claims that they were affected by the disapproved language.

Consent and Order Levying a Fine Upon Union Labor Life Insurance Co.

**ORIGINAL**

## CONCLUSION OF LAW

1. By its issuance of unfiled group life certificates and riders to 143 Washington residents, Union Labor violated RCW 48.18.100 and engaged in an unfair trade practice under WAC 284-30-600(3)(b).

## CONSENT TO ORDER

NOW, THEREFORE, The Union Labor Life Insurance Co. consents to the following in consideration of its desire to resolve this matter without further administrative or judicial proceedings, and the Insurance Commissioner consents to settle the matter in consideration of the company's fine on such terms and conditions as are set forth below:

1. Union Labor consents to the foregoing Findings of Fact and Conclusion of Law as they pertain to these facts, consents to the entry of the Order and waives further administrative or judicial challenge to the OIC's actions related to the subject matter of the Order;
2. Within thirty days of the entry of this Order, Union Labor agrees to pay to the OIC a fine in the amount of \$14,300;
3. Failure to pay the fine set forth in paragraph two shall constitute grounds for the revocation of Union Labor's certificate of authority; and
4. Union Labor understands and agrees that any future failure to comply with the statutes which are the subject of this Order constitutes grounds for further penalties which may be imposed in direct response to that further violation.

EXECUTED this 23<sup>rd</sup> day of December, 2005.

THE UNION LABOR LIFE INSURANCE CO.

By: James E. Valentine

Title: Acting General Counsel

## ORDER OF THE INSURANCE COMMISSIONER

NOW, THEREFORE, pursuant to the foregoing Findings of Facts, Conclusion of Law, and Consent to Order, the Insurance Commissioner hereby orders as follows:

1. The Union Labor Life Insurance Co. is ordered to pay a fine in the amount of \$14,300.
2. The company's failure to pay the fine within the time limit set forth above shall result in the revocation of the insurer's Certificate of Authority, and

in the recovery of the fine through a civil action brought on behalf of the Commissioner by the Attorney General.

ENTERED AT TUMWATER, WASHINGTON this 26<sup>th</sup> day of December, 2005.

Mike Kreidler  
Washington State Insurance Commissioner

By: Andrea L. Philhower  
Andrea L. Philhower  
Staff Attorney, Legal Affairs Division